



May 15, 2020

FCC Docket 19-226: [Human Exposure to Radiofrequency Electromagnetic Fields A Proposed Rule by the Federal Communications Commission](#).

The BioInitiative Working Group opposes increasing public safety limits radiofrequency radiation for 6G and above (to 100 GHz) on the basis that scientific evidence has already established harmful health effects from those frequencies already in common use (800 MHz to 4G).

In January, 2020 the FCC concluded that current RF safety guidelines now several decades old which allow 1000 uW/cm² for 30 minutes exposure “*remain acceptable for protecting public health*”. The FCC investigation was, in the end, a sham since it ended without making substantial changes to lower allowable human exposure limits in the face of overwhelming evidence of the need to do so. It was a scientifically indefensible and reckless abuse of power disregarding the safety and welfare of millions of people who are currently unprotected from existing wireless technology health effects under the authority of the FCC.

That the FCC now proposes to increase permissible public safety limits for 6GHz to 4000 uW/cm² (with no time limit) is risky in the extreme. It is an erroneous presumption that shorter wavelengths do not affect the human body as much as longer wavelengths (in the 1GHz to 4GHz frequency range) now in use by the wireless industry. There is no evidence that even weakly suggests that higher frequencies are safer with respect to human health and safety simply because they have shorter wavelengths lengths. The FCC should refrain from adopting a 4000 uW/cm² limit unless and until further research demonstrates it is safe for chronic public exposure, and when cumulatively coupled with typical levels experienced by the general public from the existing body burden of exposures in the 1GHZ to 4GHz range.

There is no reason and no science to expect that 6G effects on humans will be any less than for the 1GHz to 5GHz range now widely used.

The FCC cannot rationalize the safety of 6GHz on the basis that existing wireless device use is safe, since health harm from existing wireless devices has become epidemiologically visible and indisputable.

If the FCC adopts this proposal, it will have to ignore the depth of evidence already submitted to the FCC in its review of adequacy of radiofrequency radiation human exposure limits conducted between 2013 and 2020 [Dockets 13-84, 13-39 and 13-137] where many hundreds of comments cited thousands of studies and reviews reporting adverse health effects from chronic exposure to low-intensity radiofrequency radiation. It would also ignore the proposals for establishing new



biologically-based public exposure standards based on that evidence (BioInitiative 2012 Report recommending a 3 – 6 uW/m² limit for public exposure).

It is unacceptable that the FCC is disallowing consideration of the massive amount of scientific evidence submitted in investigations conducted immediately prior to this one ([Dockets 13-84, 13-39 and 13-137) in order to frustrate and hobble public participation. All the relevant evidence submitted in Dockets 13-84, 13-39 and 13-137 should be included in this proceeding.

All that stands in the way is applying a reasonable standard of evidence to judge the science and to implement new and protective public health limits. If the FCC continues to ignore evidence of harm, or to dismiss evidence that does not constitute absolute proof in their opinion, then reasonable responses to lower safety limits will not occur. This is an abdication of responsibility to the public and a dangerous fraud perpetrated on the consumer.. If adopted, it will deliberately ignore decades of evidence reporting harmful health consequences at all those frequencies already in use and established by the preponderance of published scientific evidence.

Submitted March 15, 2020 on behalf of the BioInitiative Working Group by:

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ATTACHMENT

Prior Comments on FCC 13-39 “*Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies and Proposed Changes in the Commission’s Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*” January 2020.



The FCC is closing the investigation without taking any action to amend guidelines for human exposure, in part based on FCC reliance on the FDA's inexplicable assertion of safety to the FCC.*

The FDA's positive assertion of safety of current FCC guidelines is underlain by no apparent independent scientific investigation of the evidence. Worse, the FDA will not comment on what scientific review of all current evidence they did conduct to reach this conclusion. It appears to be complicit in deception of the public and failure to meet its mandate to the public.

This is incomprehensible in light of the outcome of the FCC's own investigations since 2013. The preponderance of evidence supports a finding of risks to health.

Several thousand comments and reply comments documenting scientific evidence of risks to health at RF exposure levels substantially lower than current safety guideline have been summarily dismissed by the FCC.

FCC 13-39 "*Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies and Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*" has been intentionally deceptive in purporting to fairly consider scientific evidence. This has been a sham process and a waste of taxpayer money and goodwill.

Meanwhile public exposures have massively increased, and diseases and deaths likely related to wireless technologies have become so prevalent as to be epidemiologically visible.

The investigations under FCC under 13-84 [13-39 and 13-137] process has been indefensibly shoddy in purporting to fairly consider scientific evidence while ignoring it. This has been a sham process and a waste of taxpayer money and goodwill.

"The FCC sets radiofrequency limits in close consultation with the FDA and other health agencies. After a thorough review of the record and consultation with these agencies, we find it appropriate to maintain the existing radiofrequency limits, which are among the most stringent in the world for cell phones," said Julius Knapp, chief of the FCC's Office of Engineering and Technology. As Jeffrey Shuren, MD, Director of the Food and Drug Administration's Center for Devices and Radiological Health, wrote to the FCC, "[t]he available scientific evidence to date does not support adverse health effects in humans due to exposures at or under the current limits..." and "[n]o changes to the current standards are warranted at this time.

Clearly, the FCC had did not conduct a fair public health assessment of the available scientific evidence and wasted nearly a decade (2011-2020).

The need for new and lower RF safety guidelines has been established.

It is apparent no amount of high quality evidence submitted to the FCC is going to be judged by them to be adequate for safety guideline changes.

Even results from the US government's own research program (NTP) are omitted from consideration. It established the last necessary leg of proof (clear evidence of cancer in animal toxicity studies performed by the National Toxicology Program, National Institutes of Health).

It must be concluded from the actions here that no amount of evidence will compel the FCC and a complicit FDA to recommend lower radiofrequency radiation guidelines.

As official agencies of the United States government, the FCC and the FDA continue to misinform and deceive the public with outdated and inadequate advice on their websites, and continue to give a false assertion of safety to wireless products in common use. Such reckless abuse of power is an offense to all people who rely on, or are governed by decision-making at the FCC and FDA.

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